

**EXHIBIT
D**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

C. M. COLLINS, N. J. LUNDY and R. C. L. MAYS, individually and on behalf of all others similarly situated,

Plaintiffs,

VS.

**CATASTROPHE RESPONSE UNIT,
INC. and CATASTROPHE RESPONSE
UNIT USA, INC.,**

Defendants.



CIVIL ACTION NO. 4:22-cv-1073

DECLARATION OF MONTE K. HURST

I, Monte K. Hurst, declare that the following statements are true and correct, and based on my personal knowledge.

1. My name is Monte K. Hurst. I am over 18 years of age, of sound mind, and have never been convicted of a felony. I am personally acquainted with the facts stated herein. I affirm that the following is true and correct.
2. I am a Shareholder, Director, and Head of Litigation at the law firm of HALLETT & PERRIN, P.C. in Dallas, Texas. I am lead counsel for Defendants Catastrophe Response Unit USA, Inc. and Catastrophe Response Unit, Inc. in this matter.
3. CRU's counsel downloaded the direct messages for a Facebook account to learn how time-consuming it would be to identify direct messages from specific individuals and redact them.
4. As we learned from this exercise of downloading the direct messages, Facebook maintains in separate folders all direct messages exchanged between a Facebook user and each other Facebook user with whom they exchanged messages. When a Facebook user asks Facebook to send to them all Facebook direct messages sent to or received by them over a certain period of time, Facebook responds by sending the requesting party all of those folders, each one of which is labeled with the name of each individual

(or the names of the multiple individuals) with whom the requesting user exchanged messages.

(This space is intentionally left blank)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED in Dallas County, State of Texas, on this 26th day of December 2023.

Monte K. Hurst
MONTE K. HURST